

Approved: Kaiya Arroyo
 KAIYA ARROYO
 Assistant United States Attorney

Before: THE HONORABLE JUDITH C. MCCARTHY
 United States Magistrate Judge
 Southern District of New York

- - - - -	X	
UNITED STATES OF AMERICA	:	22 Mag. <u>5853</u>
	:	
- v. -	:	RULE 5(c)(3)
	:	AFFIDAVIT
KULJINDER SINGH HUNJAN,	:	
	:	
Defendant.	:	
- - - - -	X	

SOUTHERN DISTRICT OF NEW YORK, ss:

MICHAEL HARRIMAN, being duly sworn, deposes and says that he is a Special Agent with the United States Department of the Treasury, Internal Revenue Service, Criminal Investigations ("IRS-CI"), and charges as follows:

On or about June 29, 2022, the United States District Court for the Southern District of Texas issued a warrant for the arrest of "Kuljinder Singh Hunjan" (the "Warrant") based on a criminal indictment (the "Indictment") charging "Kuljinder Singh Hunjan" with violating 18 U.S.C. § 1349 (conspiracy to commit bank fraud), 18 U.S.C. § 1956(h) (conspiracy to launder funds), 18 U.S.C. § 1344 (bank fraud), 18 U.S.C. § 1708 (possession of stolen mail), and 18 U.S.C. § 1028A (aggravated identity theft). Copies of the Warrant and Indictment are attached as Exhibit A and Exhibit B hereto and are incorporated by reference herein.

I believe that KULJINDER SINGH HUNJAN, the defendant, who was arrested on July 14, 2022, in the Southern District of New York, is the same person as the "Kuljinder Singh Hunjan" who is wanted by the United States District Court for the Southern District of Texas.

The bases for my knowledge and for the foregoing charge are, in part, as follows:

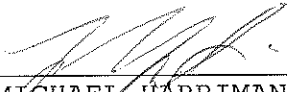
1. I am a Special Agent with the IRS-CI. I have been personally involved in determining whether KULJINDER SINGH HUNJAN, the defendant, is the same individual as the "Kuljinder Singh Hunjan" named in the Warrant from the United States District Court for the Southern District of Texas. Because this Affidavit is being submitted for the limited purpose of establishing the identity of the defendant, I have not included in this Affidavit each and every fact that I have learned. Where I report statements made by others, those statements are described in substance and in part, unless otherwise noted.

2. I am the lead investigator in Houston, Texas for IRS-CI in the investigation of "Kuljinder Singh Hunjan." During my investigation, I have reviewed bank surveillance footage showing the individual known to be "Kuljinder Singh Hunjan" depositing a check at a Chase Bank branch (the "Chase Surveillance Footage").

3. KULJINDER SINGH HUNJAN, the defendant, was arrested on or about July 14, 2022, at approximately 12:15 p.m. in Spring Valley, New York. Law enforcement located HUNJAN in the driveway of 13 Carriage Lane, which is the known address of HUNJAN's parents. I participated in HUNJAN's arrest. Directly prior to the arrest, law enforcement approached HUNJAN and asked him to identify himself. HUNJAN identified himself as "Kuljinder Hunjan."


4. After his arrest, KULJINDER SINGH HUNJAN agreed to waive his *Miranda* rights and be interviewed by law enforcement. During the interview, HUNJAN reaffirmed his identity. HUNJAN also was shown the Chase Surveillance Footage and confirmed that he was the individual in the footage.

WHEREFORE, I respectfully request that KULJINDER SINGH HUNJAN, the defendant, be imprisoned or bailed as the case may be.



MICHAEL HARRIMAN
Special Agent
Internal Revenue Service, Criminal
Investigations

Sworn to before me this
This 15th day of July, 2022.



THE HONORABLE JUDITH C. MCCARTHY
United States Magistrate Judge
Southern District of New York

EXHIBIT A

SEALED

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America
v.

KULJINDER SINGH HUNJAN

Defendant

Case No. 4:22-cr-288 1

RECEIVED
UNITED STATES MARSHAL
2022 JUN 29 PM 2:50
SOUTHERN DIST. S/TX**ARREST WARRANT**

To: Any authorized law enforcement officer

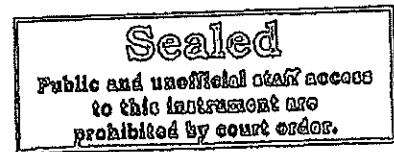
YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) KULJINDER SINGH HUNJAN

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
 ☐ Complaint
☐ Probation Violation Petition
☐ Supervised Release Violation Petition
☐ Violation Notice
☐ Order of the Court

This offense is briefly described as follows:

- Ct. 1: Conspiracy [18 USC § 1349]
 Ct. 2: Conspiracy to Launder Funds [18 USC § 1956(h)]
 Ct. 3: Bank Fraud [18 USC § 1344]
 Ct. 4: Possession of Stolen Mail [18 USC § 1708]
 Ct 5: Aggravated Identity Theft [18 USC § 1028A]

Date: June 29, 2022
*Issuing officer's signature*City and state: Houston, TXR. Becknal, Deputy Clerk*Printed name and title***Return**

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

*Arresting officer's signature**Printed name and title*

AO257 (USAO Rev. 6/99)	4:22-cr-288	Marshal's Office/Clerk's Office	Sealed Public and unofficial staff access to this instrument are prohibited by court order	PER 18 U.S.C. 3170
DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT				
BY: <input type="checkbox"/> Complaint <input type="checkbox"/> Information <input checked="" type="checkbox"/> Indictment		DEFENDANT - U.S. vs.		
Name of District Court, and/or Judge/Magistrate Location (City) UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION		KULJINDER SINGH HUNJAN United States Courts Southern District of Texas FILED June 28, 2022 Nathan Ochsner, Clerk of Court		
Name and Office of Person Furnishing Information on THIS FORM JENNIFER B. LOWERY, USA <input checked="" type="checkbox"/> U.S. Att'y <input type="checkbox"/> Other U.S. Agency		Address 13 Carriage Lane , Spring Valley, NY 10977 Birth Date 01/17/1986 <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Alien (if applicable) Social Security Number _____		
Name of Asst. U.S. Att'y (if assigned) Jay Hileman, AUSA				
Proceeding		Defendant		
Name of Complainant Agency, or Person (& Title, if any) Christopher Dozier, Secret Services		IS NOT IN CUSTODY 1) <input checked="" type="checkbox"/> Has not been arrested, pending outcome this proceeding if not detained give date any prior summons was served on above charges _____ 2) <input type="checkbox"/> Is a Fugitive 3) <input type="checkbox"/> Is on Bail or Release from (show District) _____		
<input type="checkbox"/> person is awaiting trial in another Federal or State Court, give name of court _____ <input type="checkbox"/> this person/proceeding transferred from another district per (circle one) FRCP 20, 21 or 40. Show District _____ <input type="checkbox"/> this is a reprosecution of charges previously dismissed which were dismissed on motion of: <input type="checkbox"/> U.S. Att'y <input type="checkbox"/> Defense SHOW DOCKET NO. _____ <input type="checkbox"/> this prosecution relates to pending case involving this same defendant MAG. JUDGE CASE NO. _____ <input type="checkbox"/> prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under _____		IS IN CUSTODY 4) <input type="checkbox"/> On this charge 5) <input type="checkbox"/> On another conviction 6) <input type="checkbox"/> Awaiting trial on other charges If answer to (6) is "Yes", show name of Institution _____ Has detainer been filed? <input type="checkbox"/> Yes <input type="checkbox"/> No } If "Yes" give date filed _____		
Place of offense Southern District of Texas	<input type="checkbox"/> Petty <input type="checkbox"/> Minor <input type="checkbox"/> Misdemeanor <input checked="" type="checkbox"/> Felony			
DATE OF ARREST _____		DATE TRANSFERRED TO U.S. CUSTODY _____		
Or . . . If Arresting Agency & Warrant were not Federal				

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

- Ct. 1: Conspiracy [18 U.S.C. § 1349]
 Ct. 2: Conspiracy to Launder Funds [18 U.S.C. § 1956(h)]
 Ct. 3: Bank Fraud [18 U.S.C. § 1344]
 Ct. 4: Possession of Stolen Mail [18 U.S.C. § 1708]
 Ct. 5: Aggravated Identity Theft [18 U.S.C. § 1028A]

Penalties

- Ct. 1: Up to 30 years imprisonment and/or a fine of up to \$1,000,000, followed by up to 5 years supervised release; \$100 SA.
 Ct. 2: Up to 20 years imprisonment and/or a fine of up to \$500,000 or twice the value of the funds laundered, followed by up to 3 years supervised release; \$100 SA.
 Ct. 3: Up to 30 years imprisonment and/or a fine of up to \$1,000,000, followed by up to 5 years supervised release; \$100 SA.
 Ct. 4: Up to 5 years imprisonment and/or a fine of up to \$250,000, followed by up to 3 years supervised release; \$100 SA.
 Ct. 5: Two years imprisonment consecutive to any other related term and a fine up to \$250,000 followed by up to 1 year of supervised release; \$100 SA.

SEALED

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America
v.

KULJINDER SINGH HUNJAN

Defendant

Case No. 4:22-cr-288 I

RECEIVED
UNITED STATES MARSHAL
2022 JUN 29 PM 2:50
SOUTHERN DIST. S/TX**ARREST WARRANT**

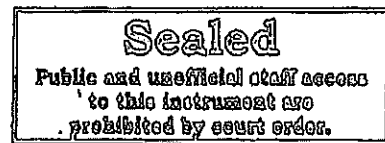
To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) KULJINDER SINGH HUNJAN,
 who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

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 Ct. 3: Bank Fraud [18 USC § 1344]
 Ct. 4: Possession of Stolen Mail [18 USC § 1708]
 Ct 5: Aggravated Identity Theft [18 USC § 1028A]

Date: June 29, 2022

Issuing officer's signature
City and state: Houston, TXR. Becknal, Deputy Clerk*Printed name and title***Return**

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

*Arresting officer's signature**Printed name and title*

A0257
(USAO Rev. 6/99) **4:22-cr-288**

Marshal's Office/Clerk's Office

Sealed
Public and unofficial staff access
to this instrument are
prohibited by court order

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ Complaint ☐ Information ☒ Indictment

Name of District Court, and/or Judge/Magistrate Location (City)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**Name and Office of Person
Furnishing Information on
THIS FORM

JENNIFER B. LOWERY, USA

☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y
(if assigned)

Jay Hileman, AUSA

Proceeding

Name of Complainant Agency, or Person (& Title, if any)

Christopher Dozier, Secret Services

☐ person is awaiting trial in another Federal or State Court, give
name of court☐ this person/proceeding transferred from another district per (circle
one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges
previously dismissed which were
dismissed on motion of:☐ U.S. Att'y ☐ DefenseSHOW
DOCKET NO.☐ this prosecution relates to pending
case involving this same defendantMAG. JUDGE
CASE NO.☐ prior proceedings or appearance(s)
before U.S. Magistrate Judge regarding
this defendant were recorded underPlace of
offense

Southern District of Texas

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony**DEFENDANT - U.S. vs.**

KULJINDER SINGH HUNJAN

United States Courts
Southern District of Texas

FILED

June 28, 2022

Nathan Ochser, Clerk of Court

Address

13 Carriage Lane
, Spring Valley, NY 10977Birth
Date

01/17/1986

☒ Male☐ Alien☐ Female

(if applicable)

Social Security Number

Defendant**IS NOT IN CUSTODY**

- 1) ☒ Has not been arrested, pending outcome this proceeding
If not detained give date any prior
summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction } ☐ Fed'l ☐ State
- 6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer
been filed?☐ Yes
☐ NoIf "Yes"
give date
filedDATE OF
ARREST

Or ... If Arresting Agency & Warrant were not Federal

DATE TRANSFERRED
TO U.S. CUSTODY**OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS**

Ct. 1: Conspiracy [18 U.S.C. § 1349]

Ct. 2: Conspiracy to Launder Funds [18 U.S.C. § 1956(h)]

Ct. 3: Bank Fraud [18 U.S.C. § 1344]

Ct. 4: Possession of Stolen Mail [18 U.S.C. § 1708]

Ct. 5: Aggravated Identity Theft [18 U.S.C. § 1028A]

Penalties

Ct. 1: Up to 30 years imprisonment and/or a fine of up to \$1,000,000, followed by up to 5 years supervised release; \$100 SA.

Ct. 2: Up to 20 years imprisonment and/or a fine of up to \$500,000 or twice the value of the funds laundered, followed by up to 3 years supervised release; \$100 SA.

Ct. 3: Up to 30 years imprisonment and/or a fine of up to \$1,000,000, followed by up to 5 years supervised release; \$100 SA.

Ct. 4: Up to 5 years imprisonment and/or a fine of up to \$250,000, followed by up to 3 years supervised release; \$100 SA.

Ct. 5: Two years imprisonment consecutive to any other related term and a fine up to \$250,000 followed by up to 1 year of supervised release; \$100 SA.

EXHIBIT B

Sealed
Public and unofficial staff access
to this instrument are
prohibited by court order

United States Courts
Southern District of Texas
FILED

June 28, 2022

Nathan Ochsner, Clerk of Court

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

VS.

KULJINDER SINGH HUNJAN
BENJAMIN THOMAS
COURTNEY TANGANIFE SMITH

§
§
§
§
§
§
§

CRIMINAL NO. H-22-

4:22-cr-288

INDICTMENT

The United States Grand Jury charges:

At all times material herein:

1. The Federal Deposit Insurance Corporation (FDIC) was an agency of the federal government which insured the deposits of member banks against loss up to \$100,000 with the purpose of preventing their collapse and instilling public confidence in the nation's banking institutions.

2. Regions Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.

COUNT 1

(Conspiracy - 18 U.S.C. § 1349)

A. INTRODUCTION

1. The Grand Jury adopts, realleges, and incorporates herein the allegations in paragraphs 1-2 of the Introduction of this Indictment as if set out fully herein.

B. THE CONSPIRACY AND ITS OBJECTS

2. From on or about November 1, 2021. and continuing until on or about April 13, 2022, in the Houston Division of the Southern District of Texas and elsewhere,

**KULJINDER SINGH HUNJAN,
BENJAMIN THOMAS, and
COURTNEY TANGANIFE SMITH,**

Defendants herein, did knowingly and willfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury to execute and attempt to execute a scheme and artifice to defraud Regions Bank, a financial institution the accounts of which were insured by the FDIC, and to obtain money, funds, and property under the custody and control of the above-listed financial institutions, by means of false and fraudulent pretenses, representations, and promises in violation of Title 18, United States Code, Section 1344 (Bank Fraud).

C. THE MANNER AND MEANS OF THE CONSPIRACY

The manner and means of the conspiracy were as follows:

3. The conspirators stole at least one United States Treasury check from the United States Mail.

4. The conspirators used forged and counterfeit identification documents to impersonate the payees on the stolen United States Treasury check and fraudulently opened bank accounts.

5. The conspirators unlawfully endorsed the United States Treasury check and deposited the check into the bank account that they had opened using the identities of the payees.

6. The conspirators withdrew the proceeds of the stolen check by writing checks to the accounts of cooperating individuals and other fraudulently created bank accounts.

7. The conspirators withdrew the illegal proceeds from the accounts of the cooperating individuals and the other fraudulently created accounts by ATM transactions, debit card purchases, and other electronic transfer methods.

D. OVERT ACTS

8. In furtherance of the conspiracy, and to affect the objects thereof, the defendants

Case 4:22-cr-00288 *SEALED* Document 1 Filed on 06/28/22 in TXSD Page 3 of 9

performed and caused to be performed, among others, the acts set forth in Counts Two through Five of this indictment, hereby re-alleged and incorporated as if fully set forth in this Count, as well as the acts listed below:

a. On or about January 10, 2022, **KULJINDER SINGH HUNJAN** opened an account at the Regions Bank, Wallisville Branch, in Harris County, Texas, in the names of M.S. and I.S. and with an account number ending in 4761.

b. On or about January 18, 2022, **KULJINDER SINGH HUNJAN** deposited a United States Treasury check payable to M.S. and I.S. in the amount of \$2,932,446.84 into the Regions Bank account ending in 4761 at a branch in Houston, Texas.

c. On or about January 28, 2022, **BENJAMIN THOMAS** deposited a check in the amount of \$250,000 from the Regions Bank account ending in 4761 to the Audrey Singh account ending in 0388 at PNC Bank.

d. On or about February 1, 2022, **BENJAMIN THOMAS** deposited a check in the amount of \$272,050 from the Regions Bank account ending in 4761 into the Milbert Crossland account at PNC Bank.

e. On or about February 21, 2022, **KULJINDER SINGH HUNJAN** deposited a check in the amount of \$147,000 into an account at Chase Bank ending in 1635.

f. On or about February 26, 2022, **BENJAMIN THOMAS** withdrew \$800 from Regions Bank account 9139 in Harris County, Texas.

g. On or about March 4, 2022, [REDACTED] deposited a check in the amount of [REDACTED] into an account in his name at [REDACTED] in Harris County, Texas.

In violation of Title 18, United States Code, Section 1349.

COUNT 2

(Conspiracy to Launder Funds - 18 U.S.C. § 1956(h))

A. INTRODUCTION

1. The allegations in paragraphs 1-2 of the Introduction of this Indictment are hereby adopted, realleged, and incorporated as if set out fully herein.

B. THE CONSPIRACY AND ITS OBJECTS

2. Beginning on or about November 1, 2021, and continuing through at least April 13, 2022, in the Houston Division of the Southern District of Texas, and elsewhere,

**KULJINDER SINGH HUNJAN,
BENJAMIN THOMAS, and
COURTNEY TANGANIFE SMITH,**

Defendants herein, together with other persons known and unknown to the grand jury, did unlawfully and knowingly combine, conspire, confederate, and agree with others, to conduct financial transactions which involved proceeds of a specified unlawful activity, that is: bank fraud, using funds obtained as a result of a scheme to defraud alleged herein, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, that is, acts chargeable as bank fraud under Title 18, U.S.C. §1344, and knowing that the transactions were designed in whole or in part to promote the carrying on of such specified unlawful activity, and to conceal and disguise the nature, source, ownership and control of the proceeds of specified unlawful activity, all in violation of Title 18, United States Code, Section 1956(a)(1)(A)(I) and (B)(I).

C. THE MANNER AND MEANS OF THE CONSPIRACY

3. Among the manner and means by which the defendants sought to accomplish and did accomplish the purpose of the conspiracy and scheme to defraud are the acts set forth in paragraphs 3 through 7 of Count One of this Indictment, hereby re-alleged and incorporated as if fully set forth in these counts.

D. OVERT ACTS

4. In furtherance of the conspiracy, and to affect the objects thereof, the defendants and the co-conspirators performed and caused to be performed, in the Southern District of Texas and elsewhere, among others, the acts alleged in Counts Three through Five of this Indictment, as well as the overt acts alleged in Count One of this Indictment, as if fully set forth in this Count.

In violation of Title 18, United States Code, Section 1956(h).

COUNT 3
(Bank Fraud - 18 U.S.C. § 1344)

A. INTRODUCTION

1. The allegations in paragraphs 1-2 of the Introduction of this Indictment are hereby adopted, realleged, and incorporated as if set out fully herein.

B. THE SCHEME AND ARTIFICE TO DEFRAUD

2. Beginning on or about November 1, 2022, and continuing through at least April 13, 2022, in the Houston Division of the Southern District of Texas, and elsewhere,

**KULJINDER SINGH HUNJAN, and
COURTNEY TANGANIFE SMITH,**

Defendants herein, did knowingly execute and attempt to execute a scheme and artifice to defraud Regions Bank, a financial institution the deposits of which were insured by the FDIC, and to obtain

moneys and funds owned by and under the custody and control of the above-listed financial institutions, by means of false and fraudulent pretenses, representations, and promises as further set forth in the counts below.

C. THE MANNER AND MEANS OF THE SCHEME

3. Among the manner and means by which the defendants sought to accomplish and did accomplish the purpose of the scheme to defraud are the acts set forth in paragraphs 3 through 7 of Count One of this Indictment, hereby re-alleged and incorporated as if fully set forth in these counts.

D. EXECUTION OF THE SCHEME AND ARTIFICE

4. On or about January 18, 2022, the Defendants executed and attempted to execute the scheme and artifice set forth above by knowingly and fraudulently depositing a United States Treasury check in the amount of \$2,932,446.84 into a Regions Bank account opened in the names of M.S. and I.S.

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT 4
(Possession of Stolen Mail – 18 U.S.C. § 1708)

From on or about November 1, 2021, until on or about January 18, 2022, in the Houston Division of the Southern District of Texas,

**KULJINDER SINGH HUNJAN, and
COURTNEY TANGANIFE SMITH,**

Defendants herein, did possess a United States Treasury check payable to M.S. and I.S., which had been stolen from the United States Mail, knowing that said item had been stolen.

In violation of Title 18, United States Code, Sections 1708 and 2.

COUNT 5
(Aggravated Identity Theft- 18 U.S.C. § 1028A)

From on or about January 3, 2022, until on or about January 18, 2022, in the Houston Division of Southern District of Texas and elsewhere,

**KULJINDER SINGH HUNJAN, and
COURTNEY TANGANIFE SMITH,**

Defendants herein, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another, that is, the name, date of birth and social security number of victims M.S. and I.S., real persons, during and in relation to a violation of Title 18, United States Code, Section 1344 (Bank Fraud).

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

NOTICE OF FORFEITURE
(18 U.S.C. §§ 981(a)(1)(C), 982(a)(1), & 982(a)(2); 28 U.S.C. § 2461(c))

Pursuant to Title 18, United States Code, Section 982 (a)(2)(A), the United States gives notice to the defendants,

**KULJINDER SINGH HUNJAN,
BENJAMIN THOMAS, and
COURTNEY TANGANIFE SMITH,**

t that in the event of conviction of the offenses charged in Counts 1 and 3 of this Indictment, the United States intends to seek forfeiture of all property constituting or derived from proceeds obtained, directly or indirectly, as the result of such offenses.

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States gives notice to the defendants,

KULJINDER SINGH HUNJAN,

**BENJAMIN THOMAS, and
COURTNEY TANGANIFE SMITH,**

that in the event of conviction of the money laundering offense charged in Count 2 of this Indictment, the United States intends to seek forfeiture of all property, real or personal, involved in the money laundering conspiracy or traceable to such property.

Pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C), the United States gives notice to defendants

**KULJINDER SINGH HUNJAN, and
COURTNEY TANGANIFE SMITH,**

that in the event of conviction of the offense charged in Count 4 of this Indictment, the United States intends to seek forfeiture of all property, real or personal, which constitutes or is derived from proceeds traceable to such offense.

Money Judgment and Substitute Assets

The United States gives notice that it will seek a money judgment against each defendant. In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendants up to the value of the property subject to forfeiture.

TRUE BILL

Original Signature on File

FOREPERSON OF THE GRAND JURY

JENNIFER B. LOWERY
United States Attorney



JAY HILEMAN
Assistant United States Attorney